

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEBRASKA

UNITED STATES OF AMERICA,)	4:12cr3072
)	
Plaintiff,)	MOTION FOR PRETRIAL RELEASE
)	
vs.)	
)	
BRANDON DAVIS,)	
)	
Defendant.)	

COMES NOW the defendant, Brandon Davis, by and through counsel, Jerry M. Hug, and moves this Court for an Order authorizing investigation of the proposed plan by U.S. Pretrial Services and subsequently pretrial release should the investigation deem it appropriate. In support of this Motion, Davis states as follows:

- (1) Davis is currently in custody in Saline County Corrections;
- (2) Davis has had a substance abuse evaluation completed and the recommendation is that he attend intensive out patient treatment. This report has been forwarded to counsel by U.S. Pretrial Services. Davis has informed counsel that he desires to attend substance abuse counseling as part of pretrial release;
- (3) Davis' mother, Shakura Williams, has informed counsel that she is moving to a new residence on September 15, 2012 in Lincoln, NE and Davis would be able to live at that residence should release be authorized for Davis;
- (4) Ms. Williams would also be willing to act as a 3rd party custodian should the Court so require;
- (5) Counsel can provide Ms. Williams contact information to U.S. Pretrial Services for initial investigation purposes; and
- (6) Trial for Davis is pending without a firm date until pretrial motions are resolved.

WHEREFORE, for the aforementioned reasons, Davis requests an Order of the Court authorizing investigation of the proposed release plan by U.S. Pretrial Services and any

further action that the Court may deem necessary.

BY: BRANDON DAVIS, Defendant.
/s/ Jerry M. Hug
#21015
1823 Harney Street, Suite 1004
Omaha, NE 68102
(402) 346-1733

CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2012 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following: Sara Fullerton, Assistant United States Attorney.

/s/ Jerry M. Hug